

EDWARD H. KUBO, JR. 2499
United States Attorney
District of Hawaii

THOMAS A. HELPER 5676
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, Hawaii 96850-6100
Telephone: (808) 541-2850
Facsimile: (808) 541-3752
E-mail: tom.helper@usdoj.gov

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CHRISTOPHER GAHR,)	CIVIL NO. 03-00567 JMS BMK
)	
Plaintiff,)	DEFENDANT'S SUPPLEMENTAL
)	PROFFER OF EVIDENCE REGARDING
vs.)	PERSONNEL ACTIONS OTHER THAN
)	PLAINTIFF'S TERMINATION;
MICHAEL CHERTOFF, Secretary,)	CERTIFICATE OF SERVICE
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendants.)	
)	

DEFENDANT'S SUPPLEMENTAL PROFFER OF EVIDENCE REGARDING
PERSONNEL ACTIONS OTHER THAN PLAINTIFF'S TERMINATION

INTRODUCTION

Defendant hereby supplements its Proffer of Evidence
Regarding Personnel Actions Other Than Plaintiff's Termination:

1. The decision of Lowrey Leong to hire Caucasian William Pursley as Stakeholder Liaison in August of 2002.
2. The decision of Lowrey Leong to hire Caucasian Jennifer LaPierre as his secretary in August of 2002.

DATED: April 19, 2007, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

/s/ Thomas A. Helper
By _____
THOMAS A. HELPER
Assistant U.S. Attorney

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

CHRISTOPHER GAHR,)	CIVIL NO. 03-00567 JMS BMK
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendants.)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the date and by the method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by Facimile at 808-523-1088:

Moises A. Aviles	April 19, 2007
Aviles & Associates	
560 N. Arrowhead Ave., Suite 2A	
San Bernardino, CA 92401	

Served Electronically through CM/ECF:

G. Todd Withy	April 19, 2007
Withylawcourt@aol.com , withylaw@aol.com	

Attorneys for Plaintiff
CHRISTOPHER GAHR

DATED: April 19, 2007, at Honolulu, Hawaii.

/s/ Coleen Tasaka-Shoda
